



# South Coast Air Quality Management District

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**FAXED: JUNE 1, 2006**

June 1, 2006

Mr. Brian Foote  
City of San Bernardino,  
Development Services Department,  
300 North "D" Street,  
San Bernardino, CA 92418

Dear Mr. Foote:

**Initial Study for the Shenandoah Way Warehouse  
City of San Bernardino: May 2006**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document.

Given that the proposed project is a warehouse that will be generating considerable amount of truck traffic, SCAQMD staff is concerned that the Lead Agency has not evaluated the health impacts of the diesel particulate from the heavy-duty delivery trucks. SCAQMD staff believes that a Health Risk Assessment is warranted to determine if the cancer risk is significant.

Please find additional comments regarding the proposed project. The SCAQMD is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Susan Nakamura  
Planning & Rules Manager,  
Toxics Rulemaking and CEQA Analysis

Attachment  
SN: CB  
SBC060510-01  
Control Number

### **Initial Study (IS) for the Shenandoah Way Warehouse**

1. **Diesel Truck Emissions:** The proposed project at buildout will generate approximately 1,776 daily vehicle trips. According to Table 4-3 on page 4-2 of the Traffic Impact Study Report, approximately 44 percent of these vehicle trips will be truck trips. Given that the California Air Resources Board (CARB) has designated diesel particulate as a carcinogen, the lead agency needs to demonstrate that the diesel emissions from these trucks will not pose a health (cancer) risk to sensitive receptors along the truck routes. SCAQMD staff therefore recommends that the lead agency perform an air toxics health risk analysis of the diesel truck emissions for the proposed project. The SCAQMD has prepared guidance for preparing such an analysis which can also be accessed at the SCAQMD website: [www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html).
2. **Mitigation Measures:** If the health risks are determined to be significant, the following measures are recommended for the lead agency to consider where applicable or feasible:
  - Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
  - Require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the lead agency should encourage the use of particulate filters, oxidation catalysts and low sulfur diesel as defined in SCAQMD Rule 431.2, i.e., diesel with sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO<sub>x</sub> emissions by 50 percent.
  - Use aqueous or emulsified diesel fuel for all equipment. Aqueous diesel formulations have received interim verification by the CARB and show a reduction of 16% in NO<sub>x</sub> and 60% in PM<sub>10</sub> from diesel exhaust. Information on aqueous diesel formulations can be found at the following websites: [www.arb.ca.gov/fuels/ddiesel/altdiesel/altdiesel.html](http://www.arb.ca.gov/fuels/ddiesel/altdiesel/altdiesel.html), [www.lubrizol.co/PuriNox/markets\\_distributors.asp](http://www.lubrizol.co/PuriNox/markets_distributors.asp), [www.cleanfueltech.com/Customers/Customers.htm](http://www.cleanfueltech.com/Customers/Customers.htm).
  - Restrict idling emissions by using auxiliary power units and electrification.
  - Enforce truck parking restrictions.
  - Restrict truck traffic on some routes.
  - Provide a minimum of 300-meter buffer zone between truck traffic and sensitive receptors.
  - Redirect truck route to avoid residential areas or schools.
  - Improve traffic flow through signal synchronization.
  - Provide electrical sources for service equipment and docking of trucks.
  - Use light-colored roof materials to deflect heat.
  - Install solar panels on roof to supply electricity for air conditioning.

- Use double-paned windows to reduce thermal loss.
- Install central water heating systems to reduce energy consumption, and
- Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the SCAQMD CEQA Handbook.